

December 14, 2016

via electronic filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Notice of Ex Parte
Transition from TTY to Real-Time Text Technology
CG Docket No. 16-145, GN Docket No. 15-178

Dear Ms. Dortch:

On Wednesday, December 14, 2016, at 9:38 am ET, Karen Peltz Strauss and Suzy Rosen Singleton of the Consumer and Governmental Affairs Bureau (CGB) called Christian Vogler of Gallaudet University Technology Access Program, Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing (DHH-RERC), Gregg Vanderheiden of Trace Center at the University of Maryland, Universal Interface and Information Technology Access Rehabilitation Engineering Research Center (UIITA-RERC), Zainab Alkebsi of the National Association of the Deaf, David Bahar of Communication Service for the Deaf (CSD), and Drew Simshaw of the Institute for Public Representation (IPR), Georgetown Law, counsel to Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), with questions regarding the above-referenced proceedings, and called Drew Simshaw again at 12:32 pm ET for further clarification. In accordance with 47 CFR 1.1206(b), these communications took place under sunshine exemptions enumerated in 47 CFR 1.1203(a)(1) and 47 CFR 1.1204(a)(10).

During the calls, in response to Ms. Strauss and Ms. Singleton's questions, we referenced points expressed in the RERCs' and TDI's notices of ex parte filed on November 8, 2016¹ and December 9, 2016², respectively, and our ex parte filed on December 13, 2016³, in the same dockets. Specifically, we clarified points regarding interoperability, safe harbor standards, and the ability to support RTT and voice as part of the same call. We also reiterated comments regarding the essential nature of certain RTT implementation requirements, as well as appropriate flexibility for certain specific requirements pertaining to wireless RTT. We also reiterated that our top priority is seeing that the Commission takes advantage of the significant efforts, consensus-building, and compromises that have taken place throughout this

¹ See DHH-RERC, UIITA-RERC, and Omnitor Notice of *Ex Parte*, Dkts. 16-145, 15-178 (Nov. 8, 2016).

² See TDI Notice of *Ex Parte*, Dkts. 16-145, 15-178 (Dec. 9, 2016).

³ See TDI and RERCs Notice of *Ex Parte*, Dkts. 16-145, 15-178 (Dec. 13, 2016).

proceeding by wireless carriers, industry stakeholders, consumers, academics, and the Commission, to ensure that RTT is interoperable and available to all users.

Please do not hesitate to contact us if you have any questions regarding this filing.

Respectfully submitted,

/s/
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CC (by email): Karen Peltz Strauss, Suzy Rosen Singleton